

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MICHAEL RIZZO,

Plaintiff,

-against-

NEW YORK CITY DEPARTMENT OF  
SANITATION and CITY OF NEW YORK.

Defendants.

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**NOTICE OF  
PLAINTIFF'S MOTION  
TO REOPEN  
DISCOVERY**

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23-CV-7190-JAV

**NOTICE OF PLAINTIFF'S MOTION TO REOPEN DISCOVERY**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law in Support of PLAINTIFF MICHAEL RIZZO's Motion to Reopen Discovery, dated February 5, 2025, and upon all the papers and proceedings previously had herein, the undersigned will move this Court, before the Hon. Jeannette Vargas, United States District Court Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, Courtroom 703, New York, NY, 10007, on a date and time to be determined by the Court, for an order reopening fact discovery for a limited period to allow the Defendant's production of outstanding Electronically Stored Information (ESI) and responses to interrogatories, and the scheduling of key depositions, and for such further relief as the Court deems just and proper, and for further relief as the Court may deem just and proper.

Dated: Staten Island, NY

February 5, 2025



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